

3028432-MLC/EDC

Attorney No. 26135-45

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

SHEILA LOCKHART,)	
)	
Plaintiff,)	
)	
vs.)	No. 2:15-cv-00445
)	
TIMOTHY RASPOPTSIS; PRECISION)	Magistrate Judge Paul R. Cherry
PIPELINE, LLC; and MASTEC, INC.,)	Judge Theresa L. Springmann
)	
Defendants.)	

NOTICE OF SETTLEMENT

NOW COME the Defendants, TIMOTHY RASPOPTSIS, PRECISION PIPELINE, LLC, and MASTEC, INC. (“Defendants”), by and through their attorneys, Michelle L. Casper and Elizabeth D. Charnowski of SmithAmundsen LLC, and hereby notifies this Honorable Court that the parties have reached settlement. In furtherance of this Notice, Defendants state as follows:

1. Plaintiff and Defendants reached settlement of this Personal Injury Lawsuit on December 12, 2017. *See Exhibit A*, Correspondence affirming settlement.
2. At the time the parties reached settlement, Plaintiff Sheila Lockhart had a pending *and open* bankruptcy case before the U.S. Bankruptcy Court, Northern District of Indiana (Hammond), Petition # 14-21307-jra. The bankruptcy trustee in that case is Paul Chael and Ms. Lockhart’s attorney in the Bankruptcy Case is Drew Rhed.
3. Defendants’ counsel contacted both Attorneys Chael and Rhed to advise them of the pending settlement. Attorney Rhed advised he would file a Motion to Compromise as soon as possible in the Bankruptcy Case. *See Exhibit B*, Correspondence to Attorneys Chael and Rhed.

4. As of the date of filing of this Motion, a Motion to Compromise has not yet been filed in the Bankruptcy Case. Until that is done, the parties in the Personal Injury Lawsuit are unable to prepare formal settlement documents or request and issue any settlement drafts.

5. Defendants' counsel files this Notice in order to inform the Court of the efforts taken to date to finalize the settlement. Defendants' counsel will continue to work with the attorneys in the Bankruptcy Case to bring these matters to resolution.

6. In light of the settlement, any and all remaining deadlines, including the March 26, 2018 trial date, should be stricken from the Court's calendar.

WHEREFORE, Defendants, TIMOTHY RASPOPTIS, PRECISION PIPELINE, LLC, and MASTEC, INC., by counsel, hereby notify this Court of the settlement reached with Plaintiff Sheila Lockhart and request that this Court strike the remaining deadlines and the trial date, along with all other relief the Court deems appropriate and just.

Respectfully submitted,

/s/Michelle L. Casper

Attorney for Timothy Raspoptsis, Precision Pipeline, LLC, and MasTec, Inc.

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, pursuant to 28 U.S.C. § 1746 and Local Rule 5-2, that on the date indicated below, I filed this document with the Clerk of the Court using the CM/ECF electronic filing system, which will send notification of such filing to all attorneys of record, and that if any attorney/*pro se* litigant is a non-participant of the CM/ECF system, a copy of the same will be mailed on or before 5:00 p.m. on said date.

In addition, copies of the foregoing Notice are provided to the following attorneys handling the companion Bankruptcy Case via e-mail:

Paul R. Chael
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Drew C. Rhed
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/s/Michelle L. Casper

Dated this 17th day of January, 2018